

JAMES KOTCON: Good afternoon. My name is James Kotcon. I'm from Morgantown, West Virginia. I currently serve as the conservation chair for the West Virginia chapter of the Sierra Club.

I have some written comments that I'll be filing. But sort of summarize some of the things we have heard here today.

In real life I teach at West Virginia University and through a course on environmental impact assessment where we study the process so I have a pretty good grasp of what you're proposing on this Programmatic EIS. You will be considering the effects of several alternatives, one of those might be to resume the leasing program, in terms business as usual, and maybe end somewhere in between.

I am here today to urge that you look very seriously at the no leasing alternative. I realize that from an agency whose mission is to issue leases that's going to be a very heavy lift, and I'd like to give you some reasons why.

We have heard a lot about the problems with the leasing program, the need to reform reclamation bonding, the need to end the self bonding, the need to consider and incorporate the social cost of carbon in the leasing costs, a lot of the adverse impacts on mining communities and so on. And I think you need to consider each of those.

EPA asks that you consider both the direct impacts of your alternatives as well as the indirect and cumulative impacts. Much of what we have heard today is testimony from the eastern United States really looks as evidence of the indirect and cumulative impacts of leasing from western states coal.

It will be easy to disregard some of this testimony today as not relevant to the western states leasing programs, and I'm urging you to resist that temptation to disregard that and instead look at the impacts on eastern states of the leasing programs in western United States.

For example, about 40 percent of the

coal burned in coal-fired power plants in West Virginia is actually western coal. So the air pollution impacts of that western coal, the mercury in the streams, the impacts to fisheries, is an indirect impact of your leasing program, and it's happening in my home State of West Virginia. Please consider that in your analysis.

There are indirect impacts of burning western coals on eastern coal communities, impacts to workers. Right now a number of the major mining companies in West Virginia are bankrupt and don't have the money for reclamation. It is important that you get an estimate of the true cost of coal and that you fully consider those in your analysis. Thank you.